



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

MEMORANDUM:

From: Kevin Sweeney, Senior Entomologist

Date: April 2, 2013

Subject: PRODUCT PERFORMANCE DATA EVALUATION RECORD

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DP barcode: 406601

Decision no.: 470154

Submission no: 924424

Action code: R310

Product Name: RF2184 DSO XM

EPA Reg. No or File Symbol: 2724-IGL

Formulation Type: RTU spot-on for dogs

Ingredients statement from the label with PC codes: 30.0% etofenprox (pc code 128965)
and 5.0% piperonyl butoxide (pc code 067501)

Application rate: spot-on based on number of vials per unit weight

Use pattern: dog spot-on

OCSPP Guidelines: 810.3300

I. Action Requested: Review cited efficacy data and new product label.

II. Background: Registrant cited the efficacy studies used to support EPA Reg. No 2724-796. They also cited one additional MRID. Unlike the EPA Reg. No. 2724-796, this product contains the adulticide component only – etofenprox plus PBO. There is no S-methoprene in the new product and no IGR claims are made. The application rates of the adulticide components are the same as for EPA Reg. No. 2724-796. The label claims of the new product are the same as those for EPA Reg. No. 2724-796 except that the IGR claims have been removed. However, the registrant has proposed a few new claims for ticks and these are highlighted on the draft label in red typeface.

III. Study Reviews

The cited studies are: MRIDs 47518511, 47518512, 47518513, 47578402, 47844002, and 48679501. All of the cited data pertaining to EPA Reg. No. 2724-796 have already been reviewed by the EPA. Attached please find DERs by Clayton Myers. The data matrix also includes MRID 48679501, which was not used to support EPA Reg. No. 2724-796.

Conclusion: the cited studies are acceptable except for MRID 48679501, which is a characterization study that did not show good efficacy. The cited studies support the label claims except for the two new residual claims for brown dog tick and blacklegged tick/deer tick. These claims were rejected in previous reviews for EPA Reg. No. 2724-796. A copy of the most recently accepted product label is attached.

IV. Entomologist's Recommendations:

1. The proposed label is acceptable provided that the registrant:
 - a. Removes the following;
 - "Kills Brown Dog ticks (for) (28 days) (30 days) (1 Month) (4 weeks)"
 - "Kills deer ticks (that may carry Lyme disease) (for) 28 days) (30 days) (1 month) (4 weeks) (on dogs)"